



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

September 10, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Treasure Island and Yerba Buena Island Redevelopment Project Draft
Environmental Impact Report

Dear Mr. Wycko:

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island Redevelopment Project (Project). The proposed Project would include development on Treasure Island and Yerba Buena Island, including up to 8,000 residential units; up to 140,000 square feet (sq. ft.) of new commercial and retail space; up to 100,000 sq. ft. of new office space; adaptive reuse of three historic buildings with up to 311,000 sq. ft. of commercial, retail and/or flex space; about 500 hotel rooms; rehabilitation of historic buildings; new and/or upgraded public and community facilities and utilities; 300 acres of open space; an expanded marina; and a new ferry terminal and intermodal transit hub. Construction and build out of the proposed Project would be phased and would be anticipated to occur over a 15- to 20-year period.

District staff is impressed with and strongly supports the Project's commitment to building an energy efficient, compact mixed-use development that encourages residents and employees to use transit, walking and bicycling facilities for transportation needs, and actively discourages reliance on private automobiles through congestion pricing for residents and parking pricing for residents and visitors. The Project's commitment to unbundling parking spaces from housing units is just one example of the forward-thinking aspects of this Project. Projects like this not only will help the Bay Area move towards reaching the State's AB32 greenhouse gas (GHG) reduction goals, but also will serve as a model for other jurisdictions seeking to reduce GHG emissions and build energy efficient communities.

While staff supports the above referenced attributes that will serve to reduce air pollutants from this Project, staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with Project construction and operation emissions. The San Francisco Bay Area region is currently in non-attainment for state and federal ozone standards and fine particulate matter (PM2.5) standards, and for state PM10 standards. The emissions associated with this Project need to be mitigated to the maximum extent feasible to ensure the Project does not adversely affect the region's ability to attain health-based ambient air quality standards.

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Air Quality Mitigation Measure-2

The DEIR states that Air Quality Mitigation Measure-2 (M-AQ-2) requires the project sponsor to commit to converting all construction diesel equipment to EPA Tier 3 engine standards or better, or utilize diesel oxidation catalysts, diesel particulate filters or similar technology *to the extent feasible* at the start of construction, and utilize EPA Tier 4 engine standards for 50 percent of the fleet at the start of construction, increasing to 75 percent by 2015, and 100 percent by 2020, *to the extent feasible*.

District staff recommends “to the extent feasible” be stricken from this clause and M-AQ-2 changed to state that the all construction diesel equipment utilized *shall be* as clean as Tier 3 engine standards, and that Tier 4 engine standards *shall be* 100 percent utilized by 2018. In addition, staff also recommends that diesel generators for construction activity be prohibited as a condition of Project approval.

M-AQ-2 also states that *to the extent feasible*, year 2007 or newer model year haul trucks shall be utilized. District staff recommends that “to the extent feasible” be stricken from this clause, and that the City require use of year 2010 or newer model year haul trucks.

Air Quality Mitigation Measure-5

Mitigation Measure AQ-5 (M-AQ-5) requires all ferries providing service between Treasure Island and San Francisco to be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions.

District staff recommends that the EIR state that all ferries that serve Treasure Island meet the most stringent California Air Resources Board regulations for new vessels. In addition, the project sponsors should take additional steps to ensure maximum ferry ridership, for example by subsidizing ferry tickets, or further adjusting pricing mechanisms to discourage vehicle trips to and from the Project to San Francisco.

In addition to the specific measures above, the City could establish an offsite mitigation program that project sponsor(s) could pay into if on-site construction and/or operation emission reductions cannot lower emissions to the less-than-significant level.

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Chris Daly
BAAQMD Director Eric Mar
BAAQMD Director Gavin Newsom